



U.S. Department of Justice

*Civil Division
Federal Programs Branch*

*1100 L St NW
Washington, D.C. 20012*

May 22, 2025

BY ECF

The Honorable Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15C
New York, NY 10007

Re: *MTA, et al. v. Duffy, et al.*, No. 25 Civ. 1413 (LJL)

Dear Judge Liman:

We write respectfully on behalf of the Defendants to request an extension of seven days to respond to the operative complaints (ECF 63, 96). Good cause exists for this request.

At the outset, Defendants recognize that the Court denied our initial request to extend all the deadlines. *See* ECF 119–121. Nonetheless, Defendants now ask the Court to extend Defendants’ response deadline to the operative complaints to June 3, 2025. Defendants and their counsel have diverted resources from responding to the operative complaints to respond to Plaintiffs’ and Intervenor-Plaintiffs’ Preliminary Injunction Motions. Defendants are also dedicating resources to prepare for the upcoming hearing on these motions, which is scheduled the same day that the response to the operative complaints (ECF 63, 96) and the production of the administrative record are currently due, and the day after a Federal holiday. Counsel for Defendants also have competing deadlines in other cases. A seven-day extension would give Defendants the time to adequately respond to the operative complaints. This extension is not sought to delay the case but to provide Defendants and their counsel sufficient time to prepare for the preliminary injunction hearing, produce the administrative record, and respond to the complaint—which, without any extension, all fall on the same day.

Defendants will still produce the administrative record as currently ordered on May 27, 2025. Thus, this extension will not affect any other deadlines in the case.

Counsel for Defendants conferred with all Plaintiffs’ counsel via email on May 21, 2025. Plaintiffs do not object to giving Defendants until June 3, 2025 to respond to the operative complaints.

Page 2

Respectfully,

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cc: All Counsel of Record (via ECF)